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## HOW FOOD STANDARDS ARE MADE

A radio talk by Mr. W. S. Frisbie, Chairman, Food Standards Committee, Food, Drug, and Insecticide Administration, delivered through station WRC and 32 other stations associated with the National Broadcasting Company, November 27, Eastern Standard Time.

In April of this year the Food Standards Committee announced through the press a proposed definition and standard for whole wheat flour. This flour is defined--synonymous with entire wheat flour and graham flour--as the ground product of wheat containing in their natural proportions all the constituents of the grain; in other words, milled wheat without addition, subtractions, or other manipulation. The committee received a number of letters, as is usual after publication of these tentative standards, but in this instance some of the writers commended the members for their interest in and support of whole wheat flour as an article of exceptional nutritional merit compared to white flour. The point is that the Standards committee is not and can not be concerned with the actual or alleged importance of one food compared to another based on its value from a nutritional or dietetic standpoint. The function of the committee is to define and fix standards of composition for commercially important articles of food so that these foods may be definitely identified for the purpose of enforcing the food laws.

The Federal food and drugs act sets standards for certain drugs but is silent with respect to standards for foods and in the twenty-three years in which it has been in force Congress has amended it in but one instance so far as standards for foods are concerned, that in the case of butter passed in 1923 requiring a minimum of 80% fat in the finished product.

If the Government is to insure the public against adulterated foods it is evident that it must have some definite basis on which to proceed in the case of the many articles of food which through manufacturing processes may vary widely in composition. The Secretary of Agriculture consequently has appointed a committee of nine members, which is officially known as the Food Standards Committee and whose function it is to devise and recommend to the Secretary definitions and standards for food products. There has been a committee on food standards in the Department of Agriculture since 1902,-- four years before the act was passed,-- and the present committee was organized in 1914. Three members represent the Association of Dairy, Food and Drug Officials of the United States, three represent the Association of Official Agricultural Chemists, and three are appointed from the United States Department of Agriculture. That 2/3 of the committee membership is drawn from state offices is accounted for by the fact that 47 of the 48 states have enacted food laws comparable to the Federal Food and Drugs act, and the further fact that about 18 of these states automatically adopt the standards promulgated by the Secretary of Agriculture as the official state standards, the violation of which is tantamount to infraction of the state law.

When in the opinion of the administrative officials enforcing the Federal Food law, a definition or standard for a food product is necessary the Food Standards Committee is requested to take under consideration the formulation of

such a definition and standard. The committee first assembles all the available authentic information concerning the article in question, its probable or actual composition as revealed by chemical analysis, or from information applied by the industry and the methods of manufacture or preparation. When the committee has agreed upon a definition and standard which will accurately describe the composition of the article in question, the proposed definition is given to the public through the medium of the press and through technical and trade journals. On these proposals criticism and comment are invited from the consuming public, from food officials and from the industry concerned. If little or no adverse comment is received and the definition appears acceptable the committee, usually at its next meeting, takes final action in recommending the adoption of the standard to the Secretary of Agriculture and after approval by him it is issued as a departmental definition and standard to be used in the administration of the Federal food and drugs act and as a guide to the industry.

If there has been much comment, particularly of an adverse nature on a proposed definition, the committee invites all those interested to a public hearing in Washington. If, as a result of this hearing, the committee deems it proper to revise the proposed definition this is done and this revision made in harmony with the comments received from the public, from food officials and from the industry. This is then submitted to the Secretary with recommendation of the committee for official adoption.

While these standards are of prime importance to those enforcing the food law they are nevertheless of concern to the purchasing public. If you wish to buy a jar of preserves and select one labeled "Strawberry Preserves" with no other statement on the label, except probably the net weight of contents and name of the manufacturer, you would be assured of at least a standard strawberry preserve which means that for every 55 pounds of sugar there should be at least 45 pounds of the fruit used in its preparation and that it be sweetened with sugar and contain no added pectin. If pectin is used to stretch the product there should be appropriate label declaration. If glucose has been used as a substitute for some of the cane or beet sugar it should be labeled to show the glucose or be designated a "Glucose Strawberry Preserve."

The term "Salad Dressing" has not been defined so if you ask for salad dressing you may expect any admixture of wholesome, edible material acceptable for use on salad. If you buy mayonnaise which is defined the product should consist only of oil, egg, vinegar and seasoning. The standard requires a minimum of 50% vegetable oil and also sets a minimum for combined egg yolk and oil. The finished product contains no starches, gums or other fillers; when these are used a label declaration is required. Other examples might be given if time permitted.

Referring again to the proposed definition for whole wheat flour the committee at its October meeting agreed to hold a public hearing on this schedule in Washington sometime in the early spring of 1930. This action was taken, in spite of the uniformly favorable comment received on the proposed definitions, because of the importance of this article of food to the consuming public and to the milling and baking industries. When the definition for whole wheat flour has been adopted by the Secretary of Agriculture the identity of this product will have been definitely and officially fixed and then those advocates of whole wheat flour can be confident of securing a uniform article of known composition. Under such a standard millers will not be denied the opportunity of varying the composition of this product but such variations, as in all cases where a standard is adopted, will be required to be shown by appropriate labeling. At the present



time conditions are admittedly confused owing to various practices which have grown up in the milling and baking industries which while not intentionally dishonest, create a situation where the purchaser can not always be sure of the composition of the flour or bread he elects to purchase.

As a result of the recommendations of the Food Standards Committee the Department has adopted a long list of definitions and standards comprising nearly 300 separate items. These are known officially as "The Definitions and Standards for Food Products" and are published in a Government bulletin available to all who are interested on application to the Department of Agriculture.

While much has been said about the part which food officials play in the formulation of standards and definitions it would be distinctly unfair not to recognize the assistance rendered by the various food manufacturers and to publicly acknowledge the wholehearted cooperation which they extend to the Food Standards Committee. Since the definitions and standards adopted by the Secretary do not have the force and effect of legislation it is incumbent upon the committee to so frame the definitions that they will represent not only the consumer understanding but good commercial practice, and on the latter point the advice and comment of the manufacturing industry is invaluable. It is also worthy of note that in recent years, particularly, the food industries have been more favorably inclined to relatively high rather than low standards for food products, thereby indicating not only their desire to uphold the principles of the food law but to solicit the patronage of the public by the merit of the article sold.

